

Pl. # 8,240,431

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
KANSAS CITY DIVISION**

BRENT E. SMITH and AES RAPTOR, LLC)	
)	
Plaintiffs,)	
)	
v.)	Case No. _____
)	
GARLOCK EQUIPMENT COMPANY,)	
)	
Defendant.)	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs Brent E. Smith ("Smith") and AES Raptor, LLC ("AES") (collectively, "Plaintiffs"), through their undersigned attorneys, file this Complaint against Defendant Garlock Equipment Company ("Garlock"), and state and allege as follows:

Parties

1. Smith is a natural person residing in Weston, Missouri.
2. AES is a for-profit limited liability company formed under the laws of the State of Missouri with a principal place of business at 1349 Taney, North Kansas City, MO 64116. AES designs and manufactures fall protection products for use by commercial roofers and sheet metal workers. These products include the AES Raptor Stinger™ and the AES Raptor TriRex™. The sole member of AES is Smith.
3. Garlock is a for-profit corporation formed under the laws of the State of Minnesota with a principal place of business at 2601 Niagara Lane North, Plymouth, MN 55447. Garlock can be served through its Chief Executive Officer, Randy Rollins at the foregoing address. Garlock manufactures and sells products and equipment, including safety equipment, used by professional roofing contractors.